

No. 2021-06778

IN THE MATTER OF
THE MARRIAGE OF
DANIELLE L. FRIDGE
and
CHARLES L. FRIDGE, III and
IN THE INTEREST OF C. L. F., IV,
C. L. F. and C. L. F., CHILDREN

§
§
§
§
§
§
§

IN THE DISTRICT COURT

HARRIS COUNTY, TEXAS

245TH JUDICIAL DISTRICT

**NOTICE OF INTENTION
TO TAKE DEPOSITION BY WRITTEN QUESTIONS**

To Respondent by and through their attorney(s) of record: **Bobby K. Newman (Bobby K. Newman, PC)**

You will please take notice that twenty-four (24) days from the service of a copy hereof with attached questions, a deposition by written questions will be taken of Custodian of Records for:

Amegy Bank National Association (Bank)

before a Notary Public for **Champion Records Service, LLC**
9039 Katy Freeway, Suite 336
Houston, TX 77024
877-290-4224 Fax 877-825-0789

or its designated agent, which deposition with attached questions may be used in evidence upon the trial of the above-styled and numbered cause pending in the above named court. Notice is further given that request is hereby made as authorized under Rule 200, Texas Rules of Civil Procedure, to the officer taking this deposition to issue a subpoena duces tecum and cause it to be served on the witness to produce any and all records as described on the attached questions and/or Exhibit(s) and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

See Scope of Subpoena

and to turn all such records over to the officer authorized to take this deposition so that photographic reproductions of the same may be made and attached to said deposition.

/S/ **John E. Van Ness**
John E. Van Ness
Lilly & Van Ness, L.L.P.
3355 W Alabama Street, Suite 600
Houston, TX 77098
713-966-4444 Fax 713-966-4466
Attorney for Petitioner
SBA# 00792890
Email: Service@LVFirm.com

I hereby certify that a true and correct copy of the foregoing instrument has been forwarded to all Counsel of Record by hand delivery, FAX, and/or certified mail, return receipt requested, on this day.

Dated: September 24, 2024

by *John E. Van Ness*

by permission:



DEPOSITION SUBPOENA TO TESTIFY OR PRODUCE DOCUMENTS OR THINGS
THE STATE OF TEXAS

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es):
Custodian of Records for:

Amegy Bank National Association
c/o Its Registered Agent,
Corporation Service Company d/b/a CSC- Lawyers Inc.
211 E. 7th Street, Suite 620
Austin, TX 78701 800-601-9582 opt.2

Or wherever they can be found to be and appear before a Notary Public of my designation for:

Champion Records Service, LLC 877-290-4224
9039 Katy Freeway, Suite 336, Houston, TX 77024

or its designated agent, on **10/25/2024**, at **10 a.m.**, at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all records, including but not limited to applications, itemized statement, copies of checks, complete list of deposits, complete list of withdrawals, contracts for safe deposit boxes, promissory notes, loan agreements, signature cards, beneficiary designation forms and any other associated banking records for account in name of CCS Land Development LLC or Charles L. Fridge III, account numbers XXXXXXXXXX and XXXXXXXXXX or any other accounts opened in the name of CCS Land Development LLC or Charles L. Fridge III, from 01/01/2019 to present.

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access at any and all times whatsoever, then and there to give evidence at the instance of the **Petitioner, Danielle L. Fridge**, represented by **John E. Van Ness**, Attorney of Record, in that Certain Cause No. **2021-06778**, pending on the docket of the **District Court of the 245th Judicial District of Harris County, Texas**.

This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

IN THE MATTER OF
THE MARRIAGE OF
DANIELLE L. FRIDGE

and

CHARLES L. FRIDGE, III and
IN THE INTEREST OF C. L. F., IV,
C. L. F. and C. L. F., CHILDREN

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND THIS 24th day of September, 2024.



A handwritten signature in black ink, appearing to be "C. Champion", written over a horizontal line.

NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt.* Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

OFFICER'S RETURN

Came to hand this _____ day of _____, 20____, and executed this the ____ day of _____, 20____, in the following manner: By delivering to the witness _____, a true copy hereof. A \$_____ witness fee was tendered at time of the serve.

Returned this _____ day of _____, 20____.

PROCESS SERVER

Order No. 28739.001

No. 2021-06778

IN THE MATTER OF
THE MARRIAGE OF
DANIELLE L. FRIDGE

and

CHARLES L. FRIDGE, III and
IN THE INTEREST OF C. L. F., IV,
C. L. F. and C. L. F., CHILDREN

§
§
§
§
§
§

IN THE DISTRICT COURT

HARRIS COUNTY, TEXAS

245TH JUDICIAL DISTRICT

DIRECT QUESTIONS TO BE PROPOUNDED TO THE WITNESS

Custodian of Records for: **Amegy Bank National Association**

Records Pertaining To: **See Scope of Subpoena**

Type of Records: **Any and all records, including but not limited to applications, itemized statement, copies of checks, complete list of deposits, complete list of withdrawals, contracts for safe deposit boxes, promissory notes, loan agreements, signature cards, beneficiary designation forms and any other associated banking records for account in name of CCS Land Development LLC or Charles L. Fridge III, account numbers XXXXXXXXXX and XXXXXXXXXX or any other accounts opened in the name of CCS Land Development LLC or Charles L. Fridge III, from 01/01/2019 to present.**

1. Please state your full name and telephone number.

Name: _____

Phone Number: _____

2. Please state by whom you are employed and the business address.

Employer: _____

Address: _____

3. What is the title of your position or job?

Answer: _____

4. Are you the custodian of records for this entity?

Answer: _____

5. Are these memoranda, reports, records, or data compilations, outlined in the subpoena duces tecum, pertaining to the above-named entity, in your custody or subject to your control, supervision or direction?

Answer: _____

6. Are you able to identify these aforementioned records as the originals or true and correct copies of the originals?

Answer: _____

Order No. **28739.001**

7. Please hand to the Officer taking this deposition copies of the memoranda, reports, records, or data compilations, mentioned in Question No. 5. Have you complied? If not, why?

Answer: _____

8. Are the copies which you have handed to the Officer taking this deposition true and correct copies of such memoranda, reports, records, or data compilations?

Answer: _____

9. Were such memoranda, reports, records, or data compilations kept in the regular course of business of this facility?

Answer: _____

10. Was it in the regular course of business of this facility for a person with knowledge of the acts, events, conditions, opinion, or diagnoses, recorded to make the record or to transmit information thereof to be included in such record?

Answer: _____

11. Were the entries on these records made at or shortly after the time of the transaction recorded?

Answer: _____

12. What is the retention period of these types of records?

Answer: _____

13. Was the method of preparation of these records trustworthy?

Answer: _____

WITNESS (Custodian of Records)

Before me, the undersigned authority, on this day personally appeared _____, known to me to be the person whose name is subscribed to the foregoing instrument in the capacity therein stated, who being first duly sworn, stated upon his/her oath that the answers to the foregoing questions are true and correct. I further certify that the records attached hereto are exact duplicates of the original records.

SWORN TO AND SUBSCRIBED before me this _____ day of _____, 20____.

NOTARY PUBLIC

My Commission Expires: _____

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 92397751

Filing Code Description: Notice

Filing Description: Notice Deposition Written Questions 28739.001

Status as of 9/24/2024 3:38 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Alan Daughtry	793583	alan@alandaughtrylaw.com	9/24/2024 3:12:57 PM	SENT
Jeff Diamant - Service		service@jeffdiamantlaw.com	9/24/2024 3:12:57 PM	SENT
Joseph Indelicato	10389400	jindelicatolaw@indelicato.com	9/24/2024 3:12:57 PM	SENT
Bobby Newman	791347	bknservice@bobbyknewman.com	9/24/2024 3:12:57 PM	SENT
TJ Mitchell		tj@LVfirm.com	9/24/2024 3:12:57 PM	SENT
John E. Van Ness		Service@LVFirm.com	9/24/2024 3:12:57 PM	SENT
Claire Elizabeth Rogers		claire@lvfirm.com	9/24/2024 3:12:57 PM	SENT
Wesley Ward		hcdocket@hope-causey.com	9/24/2024 3:12:57 PM	SENT
Michael Poynter		mpoynter@vargolawfirm.com	9/24/2024 3:12:57 PM	SENT
Travis Vargo		tvargo@vargolawfirm.com	9/24/2024 3:12:57 PM	SENT

No. 2021-06778

IN THE MATTER OF
THE MARRIAGE OF
DANIELLE L. FRIDGE
and
CHARLES L. FRIDGE, III and
IN THE INTEREST OF C. L. F., IV,
C. L. F. and C. L. F., CHILDREN

§
§
§
§
§
§
§

IN THE DISTRICT COURT

HARRIS COUNTY, TEXAS

245TH JUDICIAL DISTRICT

**NOTICE OF INTENTION
TO TAKE DEPOSITION BY WRITTEN QUESTIONS**

To Respondent by and through their attorney(s) of record: **Bobby K. Newman (Bobby K. Newman, PC)**

You will please take notice that twenty (20) days from the service of a copy hereof with attached questions, a deposition by written questions will be taken of Custodian of Records for:

NextFund (Business)

before a Notary Public for **Champion Records Service, LLC**
9039 Katy Freeway, Suite 336
Houston, TX 77024
877-290-4224 Fax 877-825-0789

or its designated agent, which deposition with attached questions may be used in evidence upon the trial of the above-styled and numbered cause pending in the above named court. Notice is further given that request is hereby made as authorized under Rule 200, Texas Rules of Civil Procedure, to the officer taking this deposition to issue a subpoena duces tecum and cause it to be served on the witness to produce any and all records as described on the attached questions and/or Exhibit(s) and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

See Attached Exhibit "A"

and to turn all such records over to the officer authorized to take this deposition so that photographic reproductions of the same may be made and attached to said deposition.

/S/ **John E. Van Ness**
John E. Van Ness
SBA #00792890
Email: Service@LVFirm.com
Ashley M. Murski
SBA # 24086818
Email: ashley@lvfirm.com
Lilly & Van Ness, L.L.P.
3355 W Alabama Street, Suite 600
Houston, TX 77098
713-966-4444 Fax 713-966-4466
Attorneys for Petitioner

I hereby certify that a true and correct copy of the foregoing instrument has been forwarded to all Counsel of Record by hand delivery, FAX, and/or certified mail, return receipt requested, on this day.

Dated: September 30, 2024

by *John E. Van Ness*
by permission:



DEPOSITION SUBPOENA TO TESTIFY OR PRODUCE DOCUMENTS OR THINGS
THE STATE OF TEXAS

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es):

Custodian of Records for:

NextFund

6771 Professional Pkwy. W., Ste. 202

Sarasota, FL 34240 941-888-4541

to be and appear before a Notary Public of my designation for

Champion Records Service, LLC 877-290-4224

9039 Katy Freeway, Suite 336, Houston, TX 77024

or its designated agent, on **10/25/2024**, at **10 a.m.**, at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all records and/or documents outlined in the attached "Exhibit A-NextFund" in the custodian's control, custody or possession

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to the attached Exhibit "A", at any and all times whatsoever, then and there to give evidence at the instance of the **Petitioner, Danielle L. Fridge**, represented by **John E. Van Ness**, Attorney of Record, in that Certain Cause No. **2021-06778**, pending on the docket of the **District Court of the 245th Judicial District of Harris County, Texas**.

This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

**IN THE MATTER OF
THE MARRIAGE OF
DANIELLE L. FRIDGE**

and

CHARLES L. FRIDGE, III and

IN THE INTEREST OF C. L. F., IV,

C. L. F. and C. L. F., CHILDREN

and there remain from day to day and time to time until discharged according to law.



WITNESS MY HAND THIS 30th day of September, 2024.

A handwritten signature in black ink, appearing to be "C. Champion", written over a horizontal line.

NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt.* Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

OFFICER'S RETURN

Came to hand this _____ day of _____, 20____, and executed this the ____ day of _____, 20____, in the following manner: By delivering to the witness _____, a true copy hereof. A \$ _____ witness fee was tendered at the time of the serve.

Returned this _____ day of _____, 20____.

PROCESS SERVER

Order No. 19265.025

No. 2021-06778

IN THE MATTER OF
THE MARRIAGE OF
DANIELLE L. FRIDGE
and

CHARLES L. FRIDGE, III and
IN THE INTEREST OF C. L. F., IV,
C. L. F. and C. L. F., CHILDREN

§
§
§
§
§
§
§

IN THE DISTRICT COURT

HARRIS COUNTY, TEXAS

245TH JUDICIAL DISTRICT

DIRECT QUESTIONS TO BE PROPOUNDED TO THE WITNESS

Custodian of Records for: **NextFund**

Records Pertaining To: **See Attached Exhibit "A"**

Type of Records: **Any and all records and/or documents outlined in the attached "Exhibit A-NextFund" in the custodian's control, custody or possession**

1. Please state your full name and phone number.

Name: _____

Phone number: _____

2. Please state by whom you are employed and the business address.

Employed: _____

Address: _____

3. What is the title of your position or job?

Answer: _____

4. Are you the custodian of records for the business records for this entity?

Answer: _____

5. Are these memorandum, reports, records, or data compilations, outlined in the subpoena duces tecum, pertaining to the above-named person, in your custody or subject to your control, supervision or direction?

Answer: _____

6. Are you able to identify these aforementioned records as the originals or true copies of the originals?

Answer: _____

7. Please hand to the Officer taking this deposition copies of the memoranda, reports, records, or data compilations mentioned in Question No. 5. Have you done so? If not, why?

Answer: _____

8. Are the copies which you handed to the Officer taking this deposition true and correct copies of all such memoranda, reports, records, or data compilations?

Answer: _____

9. Were such memoranda, reports, records, or data compilations kept in the regular course of business of this entity?

Answer: _____

10. Have you turned over all records as listed under Number 1 of the attached Exhibit A? If not, please explain why not.

Answer: _____

11. Have you turned over all records as listed under Number 2 of the attached Exhibit A? If not, please explain why not.

Answer: _____

12. Have you turned over all records as listed under Number 3 of the attached Exhibit A? If not, please explain why not.

Answer: _____

13. Have you turned over all records as listed under Number 4 of the attached Exhibit A? If not, please explain why not.

Answer: _____

14. Have you turned over all records as listed under Number 5 of the attached Exhibit A? If not, please explain why not.

Answer: _____

15. Have you turned over all records as listed under Number 6 of the attached Exhibit A? If not, please explain why not.

Answer: _____

16. Have you turned over all records as listed under Number 7 of the attached Exhibit A? If not, please explain why not.

Answer: _____

17. Have you turned over all records as listed under Number 8 of the attached Exhibit A? If not, please explain why not.

Answer: _____

18. Have you turned over all records as listed under Number 9 of the attached Exhibit A? If not, please explain why not.

Answer: _____

19. Have you turned over all records as listed under Number 10 of the attached Exhibit A? If not, please explain why not.

Answer: _____

20. Have you turned over all records as listed under Number 11 of the attached Exhibit A? If not, please explain why not.

Answer: _____

21. Have you turned over all records as listed under Number 12 of the attached Exhibit A? If not, please explain why not.

Answer: _____

22. Have you turned over all records as listed under Number 13 of the attached Exhibit A? If not, please explain why not.

Answer: _____

23. Have you turned over all records as listed under Number 14 of the attached Exhibit A? If not, please explain why not.

Answer: _____

24. Have you turned over all records as listed under Number 15 of the attached Exhibit A? If not, please explain why not.

Answer: _____

25. Have you turned over all records as listed under Number 16 of the attached Exhibit A? If not, please explain why not.

Answer: _____

26. Have you turned over all records as listed under Number 17 of the attached Exhibit A? If not, please explain why not.

Answer: _____

27. Have you turned over all records as listed under Number 18 of the attached Exhibit A? If not, please explain why not.

Answer: _____

28. Have you turned over all records as listed under Number 19 of the attached Exhibit A? If not, please explain why not.

Answer: _____

29. What is the retention period of these types of records?

Answer: _____

30. Please state whether or not it was the regular course of business of the above mentioned entity for a person with knowledge of the acts, events, conditions, opinion, or diagnoses, recorded to make the record or to transmit information thereof to be included in such record.

Answer: _____

31. Were the entries on these memoranda, reports, records, or data compilations, made at or shortly after the time of the transaction recorded on these entries?

Answer: _____

32. Was the method of preparation of these records trustworthy?

Answer: _____

WITNESS (Custodian of Records)

Before me, the undersigned authority, on this day personally appeared _____, known to me to be the person whose name is subscribed to the foregoing instrument in the capacity therein stated, who being first duly sworn, stated upon his/her oath that the answers to the foregoing questions are true and correct. I further certify that the records attached hereto are exact duplicates of the original records.

SWORN TO AND SUBSCRIBED before me this _____ day of _____, 20____.

NOTARY PUBLIC

My Commission Expires: _____

Exhibit A – NextFund

Produce the following documents relating to Verde Co₂ and Charles Littleton Fridge III:

1. All correspondence and communications between any employee or representative of Verde Co₂ and NextFund, including but not limited to all emails and letters received from such individuals;
2. All correspondence and communications between Charles Littleton Fridge III and NextFund, including but not limited to all emails and letters between same;
3. All attachments to any correspondence received by NextFund from any employee or representative of Verde Co₂;
4. All attachments to any correspondence received by NextFund from Charles Littleton Fridge III via email or other electronic means;
5. Copies of any term sheets provided by Verde Co₂ or Charles Littleton Fridge III;
6. Copies of any offers provided by Verde Co₂ or Charles Littleton Fridge III in relation to its Raywood lease;
7. Copies of any cash flow models provided by Verde Co₂ or Charles Littleton Fridge III;
8. Copies of any appraisals provided by Verde Co₂ or Charles Littleton Fridge III;
9. Copies of any valuations of Verde Co₂'s Raywood lease;
10. Copies of any valuations of Verde Co₂'s assets;
11. Copies of any agreements provided by Verde Co₂ or Charles Littleton Fridge III;
12. Copies of any investor presentations received from Verde Co₂;
13. Copies of any management presentations received from Verde Co₂;
14. A copy of any document and materials contained in the data room for Verde Co₂;
15. A copy of any document provided by Verde Co₂ to NextFund;
16. All correspondence and communications between NextFund and any third party regarding Verde Co₂, specifically regarding valuations, offers to purchase, assets, and investments relating to Verde Co₂;
17. A copy of any proposed or pending equity transactions provided by Verde Co₂ to NextFund;
18. A copy of any roster of company assets provided by Verde Co₂ to NextFund;
19. Any and all financial statements provided to NextFund from Verde Co₂ or Charles Littleton Fridge III.

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 92607170

Filing Code Description: Notice

Filing Description: Notice Deposition Written Questions 19265.025

Status as of 9/30/2024 3:47 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Alan Daughtry	793583	alan@alandaughtrylaw.com	9/30/2024 2:36:03 PM	SENT
Jeff Diamant - Service		service@jeffdiamantlaw.com	9/30/2024 2:36:03 PM	SENT
Joseph Indelicato	10389400	jindelicatolaw@indelicato.com	9/30/2024 2:36:03 PM	SENT
Bobby Newman	791347	bknservice@bobbyknewman.com	9/30/2024 2:36:03 PM	SENT
TJ Mitchell		tj@LVfirm.com	9/30/2024 2:36:03 PM	SENT
John E. Van Ness		Service@LVFirm.com	9/30/2024 2:36:03 PM	SENT
Claire Elizabeth Rogers		claire@lvfirm.com	9/30/2024 2:36:03 PM	SENT
Wesley Ward		hcdocket@hope-causey.com	9/30/2024 2:36:03 PM	SENT
Michael Poynter		mpoynter@vargolawfirm.com	9/30/2024 2:36:03 PM	SENT
Travis Vargo		tvargo@vargolawfirm.com	9/30/2024 2:36:03 PM	SENT

No. 2021-06778

IN THE MATTER OF
THE MARRIAGE OF
DANIELLE L. FRIDGE
and
CHARLES L. FRIDGE, III and
IN THE INTEREST OF C. L. F., IV,
C. L. F. and C. L. F., CHILDREN

§
§
§
§
§
§
§

IN THE DISTRICT COURT

HARRIS COUNTY, TEXAS

245TH JUDICIAL DISTRICT

**AMENDED NOTICE OF INTENTION
TO TAKE DEPOSITION BY WRITTEN QUESTIONS**

To Respondent by and through their attorney(s) of record: **Bobby K. Newman (Bobby K. Newman, PC)**

You will please take notice that twenty-four (24) days from the service of a copy hereof with attached questions, a deposition by written questions will be taken of Custodian of Records for:

American Express Company (Bank)

before a Notary Public for **Champion Records Service, LLC**
9039 Katy Freeway, Suite 336
Houston, TX 77024
877-290-4224 Fax 877-825-0789

or its designated agent, which deposition with attached questions may be used in evidence upon the trial of the above-styled and numbered cause pending in the above named court. Notice is further given that request is hereby made as authorized under Rule 200, Texas Rules of Civil Procedure, to the officer taking this deposition to issue a subpoena duces tecum and cause it to be served on the witness to produce any and all records as described on the attached questions and/or Exhibit(s) and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

See Attached Exhibit "A"

and to turn all such records over to the officer authorized to take this deposition so that photographic reproductions of the same may be made and attached to said deposition.

/S/ **John E. Van Ness**
John E. Van Ness
SBA# 00792890
Email: Service@LVFirm.com
Ashley M. Murski
SBA # 24086818
Email: ashley@lvfirm.com
Lilly & Van Ness, L.L.P.
3355 W Alabama Street, Suite 600
Houston, TX 77098
713-966-4444 Fax 713-966-4466
Attorneys for Petitioner

I hereby certify that a true and correct copy of the foregoing instrument has been forwarded to all Counsel of Record by hand delivery, FAX, and/or certified mail, return receipt requested, on this day.

Dated: October 11, 2024

by *John E. Van Ness*

by permission:



DEPOSITION SUBPOENA TO TESTIFY OR PRODUCE DOCUMENTS OR THINGS
THE STATE OF TEXAS

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es):

Custodian of Records for:

American Express Company

200 Vesey Street

New York, NY 10285 888-257-7775

to be and appear before a Notary Public of my designation for

Champion Records Service, LLC 877-290-4224

9039 Katy Freeway, Suite 336, Houston, TX 77024

or its designated agent, on **11/11/2024**, at **10 a.m.**, at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all records and/or documents outlined in the attached "Exhibit A-American Express Company" in the custodian's control, custody or possession

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to the attached Exhibit "A", at any and all times whatsoever, then and there to give evidence at the instance of the **Petitioner, Danielle L. Fridge**, represented by **John E. Van Ness**, Attorney of Record, in that Certain Cause No. **2021-06778**, pending on the docket of the **District Court of the 245th Judicial District of Harris County, Texas**.

This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

**IN THE MATTER OF
THE MARRIAGE OF
DANIELLE L. FRIDGE**

and

CHARLES L. FRIDGE, III and

IN THE INTEREST OF C. L. F., IV,

C. L. F. and C. L. F., CHILDREN

and there remain from day to day and time to time until discharged according to law.



WITNESS MY HAND THIS 11th day of October, 2024.

A handwritten signature in black ink, appearing to be "Chris Champion", written over a horizontal line.

NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt.* Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

OFFICER'S RETURN

Came to hand this _____ day of _____, 20____, and executed this the ____ day of _____, 20____, in the following manner: By delivering to the witness _____, a true copy hereof. A \$ _____ witness fee was tendered at the time of the serve.

Returned this _____ day of _____, 20____.

PROCESS SERVER

A Order No. 19265.021

No. 2021-06778

IN THE MATTER OF
THE MARRIAGE OF
DANIELLE L. FRIDGE

and
CHARLES L. FRIDGE, III and
IN THE INTEREST OF C. L. F., IV,
C. L. F. and C. L. F., CHILDREN

§
§
§
§
§
§
§

IN THE DISTRICT COURT

HARRIS COUNTY, TEXAS

245TH JUDICIAL DISTRICT

DIRECT QUESTIONS TO BE PROPOUNDED TO THE WITNESS

Custodian of Records for: **American Express Company**

Records Pertaining To: **See Attached Exhibit "A"**

Type of Records: **Any and all records and/or documents outlined in the attached "Exhibit A-American Express Company" in the custodian's control, custody or possession**

1. Please state your full name.

Answer: _____

2. Please state by whom you are employed and the business address.

Employed: _____

Address: _____

3. What is the title of your position or job?

Answer: _____

4. Are you the custodian of records for the business records for this entity?

Answer: _____

5. Are these memorandum, reports, records, or data compilations, outlined in the subpoena duces tecum, pertaining to the above-named person, in your custody or subject to your control, supervision or direction?

Answer: _____

6. Are you able to identify these aforementioned records as the originals or true copies of the originals?

Answer: _____

7. Please hand to the Officer taking this deposition copies of the memoranda, reports, records, or data compilations mentioned in Question No. 5. Have you done so? If not, why?

Answer: _____

8. Are the copies which you handed to the Officer taking this deposition true and correct copies of all such memoranda, reports, records, or data compilations?

Answer: _____

9. Were such memoranda, reports, records, or data compilations kept in the regular course of business of this entity?

Answer: _____

10. Have you turned over all records as listed under Number 1 of the attached Exhibit A? If not, please explain why not.

Answer: _____

11. Have you turned over all records as listed under Number 2 of the attached Exhibit A? If not, please explain why not.

Answer: _____

12. What is the retention period of these types of records?

Answer: _____

13. Please state whether or not it was the regular course of business of the above mentioned entity for a person with knowledge of the acts, events, conditions, opinion, or diagnoses, recorded to make the record or to transmit information thereof to be included in such record.

Answer: _____

14. Were the entries on these memoranda, reports, records, or data compilations, made at or shortly after the time of the transaction recorded on these entries?

Answer: _____

15. Was the method of preparation of these records trustworthy?

Answer: _____

WITNESS (Custodian of Records)

Before me, the undersigned authority, on this day personally appeared _____,
known to me to be the person whose name is subscribed to the foregoing instrument in the capacity therein stated, who being first
duly sworn, stated upon his/her oath that the answers to the foregoing questions are true and correct. I further certify that the
records attached hereto are exact duplicates of the original records.

SWORN TO AND SUBSCRIBED before me this _____ day of _____, 20____.

NOTARY PUBLIC

My Commission Expires: _____

Exhibit A - American Express Company

1. Any and all statements from American Express from 02/01/2022 to the present for any and all credits cards in the name of Charles L. Fridge III or Charles Little Fridge III, SSN XXX-XX-XXXX
2. Any and all statements from American Express from 02/01/2022 to the present for any and all credits cards in the name of any of the following entities:
 - Verde CO2 CCS, LLC
 - Verde Co2, LLC
 - CLF Property, LLC
 - Charles L. Fridge III, P.C.
 - 3000 Smith GP, INC
 - 3000 Smith, LTD.
 - Fridge, Resendez & Wise, LLC
 - BK Verde, LLC

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 93058543

Filing Code Description: No Fee Documents

Filing Description: Notice Deposition Written Questions Amend 19265.021

Status as of 10/11/2024 10:23 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Alan Daughtry	793583	alan@alandaughtrylaw.com	10/11/2024 9:38:01 AM	SENT
Joseph Indelicato	10389400	jindelicatolaw@indelicato.com	10/11/2024 9:38:01 AM	SENT
Bobby Newman	791347	bknservice@bobbyknewman.com	10/11/2024 9:38:01 AM	SENT
Jeff Diamant - Service		service@jeffdiamantlaw.com	10/11/2024 9:38:01 AM	SENT
TJ Mitchell		tj@LVfirm.com	10/11/2024 9:38:01 AM	SENT
John E. Van Ness		Service@LVFirm.com	10/11/2024 9:38:01 AM	SENT
Claire Elizabeth Rogers		claire@lvfirm.com	10/11/2024 9:38:01 AM	SENT
Wesley Ward		hcdocket@hope-causey.com	10/11/2024 9:38:01 AM	SENT
Michael Poynter		mpoynter@vargolawfirm.com	10/11/2024 9:38:01 AM	SENT
Travis Vargo		tvargo@vargolawfirm.com	10/11/2024 9:38:01 AM	SENT

No. 2021-06778

IN THE MATTER OF
THE MARRIAGE OF
DANIELLE L. FRIDGE
and
CHARLES L. FRIDGE, III and
IN THE INTEREST OF C. L. F., IV,
C. L. F. and C. L. F., CHILDREN

§
§
§
§
§
§
§

IN THE DISTRICT COURT

HARRIS COUNTY, TEXAS

245TH JUDICIAL DISTRICT

**NOTICE OF INTENTION
TO TAKE DEPOSITION BY WRITTEN QUESTIONS**

To Respondent by and through their attorney(s) of record: **Bobby K. Newman (Bobby K. Newman, PC)**

To other party/parties by and through their attorney(s) of record: **Travis B. Vargo (Vargo Law Firm, PC)**

You will please take notice that twenty (20) days from the service of a copy hereof with attached questions, a deposition by written questions will be taken of Custodian of Records for:

See Attached Location List "A"

before a Notary Public for **Champion Records Service, LLC**
9039 Katy Freeway, Suite 336
Houston, TX 77024
877-290-4224 Fax 877-825-0789

or its designated agent, which deposition with attached questions may be used in evidence upon the trial of the above-styled and numbered cause pending in the above named court. Notice is further given that request is hereby made as authorized under Rule 200, Texas Rules of Civil Procedure, to the officer taking this deposition to issue a subpoena duces tecum and cause it to be served on the witness to produce any and all records as described on the attached questions and/or Exhibit(s) and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

See Attached Exhibit "A"

and to turn all such records over to the officer authorized to take this deposition so that photographic reproductions of the same may be made and attached to said deposition.

Ashley M. Murski
Lilly & Van Ness, L.L.P.
3355 W Alabama Street, Suite 600
Houston, TX 77098
713-966-4444 Fax: 713-966-4466
Attorney for Petitioner
SBA # 24086818
Email: ashley@lvfirm.com

John E. Van Ness
Lilly & Van Ness, L.L.P.
3355 W Alabama Street, Suite 600
Houston, TX 77098
713-966-4444 Fax 713-966-4466
Attorney for Petitioner
SBA # 00792890
Email: Service@LVFirm.com

I hereby certify that a true and correct copy of the foregoing instrument has been forwarded to all Counsel of Record by hand delivery, FAX, and/or certified mail, return receipt requested, on this day.

Dated: October 25, 2024

by John E. Van Ness
by permission:



LOCATION LIST A

Bows and Arrows Flowers (Business)
Preisler Productions LLC (Business)
Chris Bailey Photography (Business)
31 Films, L.L.C. (Business)
ACE Endeavors, Inc. (Business)
Etoilly Artistry LLC (Business)

DEPOSITION SUBPOENA TO TESTIFY OR PRODUCE DOCUMENTS OR THINGS
THE STATE OF TEXAS

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es):

Custodian of Records for:

Bows and Arrows Flowers
c/o Its Registered Agent,
Adam Rico
4908 Bryan Street
Dallas, TX 75206 214-828-2697

to be and appear before a Notary Public of my designation for

Champion Records Service, LLC 877-290-4224
9039 Katy Freeway, Suite 336, Houston, TX 77024

or its designated agent, on **11/19/2024**, at **10 a.m.**, at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all records and/or documents outlined in the attached "Exhibit A-Bows and Arrows Flowers" in the custodian's control, custody or possession

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to the attached Exhibit "A", at any and all times whatsoever, then and there to give evidence at the instance of the **Petitioner, Danielle L. Fridge**, represented by **John E. Van Ness**, Attorney of Record, in that Certain Cause No. **2021-06778**, pending on the docket of the **District Court of the 245th Judicial District of Harris County, Texas**.

This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

IN THE MATTER OF
THE MARRIAGE OF
DANIELLE L. FRIDGE

and
CHARLES L. FRIDGE, III and
IN THE INTEREST OF C. L. F., IV,
C. L. F. and C. L. F., CHILDREN

and there remain from day to day and time to time until discharged according to law.



WITNESS MY HAND THIS 25th day of October, 2024.

A handwritten signature in black ink, appearing to be "C. Champion", written over a horizontal line.

NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt.* Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

OFFICER'S RETURN

Came to hand this _____ day of _____, 20____, and executed this the ____ day of _____, 20____, in the following manner: By delivering to the witness _____, a true copy hereof. A \$ _____ witness fee was tendered at the time of the serve.

Returned this _____ day of _____, 20____.

PROCESS SERVER

Order No. 19265.028

No. 2021-06778

IN THE MATTER OF
THE MARRIAGE OF
DANIELLE L. FRIDGE

and
CHARLES L. FRIDGE, III and
IN THE INTEREST OF C. L. F., IV,
C. L. F. and C. L. F., CHILDREN

§
§
§
§
§
§
§

IN THE DISTRICT COURT

HARRIS COUNTY, TEXAS

245TH JUDICIAL DISTRICT

DIRECT QUESTIONS TO BE PROPOUNDED TO THE WITNESS

Custodian of Records for: **Bows and Arrows Flowers**

Records Pertaining To: **Any and all records and/or documents outlined in the attached "Exhibit A-Bows and Arrows Flowers" in the custodian's control, custody or possession**

1. Please state your full name and phone number.

Answer: _____

Phone Number: _____

2. Please state by whom you are employed and the business address.

Employed: _____

Address: _____

3. What is the title of your position or job?

Answer: _____

4. Are you a/the custodian of records for Bows and Arrows Flowers?

Answer: _____

5. Are the records, documents, memorandum, reports, records, and data compilations, outlined in the attached Exhibit A, in your custody or subject to your control, supervision or direction?

Answer: _____

6. Are you able to identify the aforementioned records as the originals or true copies of the originals?

Answer: _____

7. Please hand to the Officer taking this deposition, copies of the records, documents, memorandum, reports, records, and data compilations mentioned in Question No. 5. Have you done so? If not, why?

Answer: _____

8. Are the copies which you handed to the Officer taking this deposition, true and correct copies of all such records, documents, memorandum, reports, records, and data compilations?

Answer: _____

9. Were such records, documents, memorandum, reports, records, and data compilations kept in the regular course of business by Bows and Arrows Flowers?

Answer: _____

10. Have you turned over all records as listed under Number 1 of the attached Exhibit A? If not, please explain why not.

Answer: _____

11. Have you turned over all records as listed under Number 2 of the attached Exhibit A? If not, please explain why not.

Answer: _____

12. Have you turned over all records as listed under Number 3 of the attached Exhibit A? If not, please explain why not.

Answer: _____

13. Have you turned over all records as listed under Number 4 of the attached Exhibit A? If not, please explain why not.

Answer: _____

14. Have you turned over all records as listed under Number 5 of the attached Exhibit A? If not, please explain why not.

Answer: _____

15. Have you turned over all records as listed under Number 6 of the attached Exhibit A? If not, please explain why not.

Answer: _____

16. Have you turned over all records as listed under Number 7 of the attached Exhibit A? If not, please explain why not.

Answer: _____

17. What is the retention period of records of this nature by Bows and Arrows Flowers?

Answer: _____

18. Was it in the regular course of business of Bows and Arrows Flowers for a person with knowledge of the acts, events, conditions, opinion, or diagnoses, recorded to make the record or to transmit information thereof to be included in such record?

Answer: _____

19. Were the entries on the records, documents, memorandum, reports, records, and data compilations made at, or shortly after, the time of the transaction recorded on these entries?

Answer: _____

20. Was the method of preparation of these records trustworthy?

Answer: _____

WITNESS (Custodian of Records)

Before me, the undersigned authority, on this day personally appeared _____, known to me to be the person whose name is subscribed to the foregoing instrument in the capacity therein stated, who being first duly sworn, stated upon his/her oath that the answers to the foregoing questions are true and correct. I further certify that the records attached hereto are exact duplicates of the original records.

SWORN TO AND SUBSCRIBED before me this _____ day of _____, 20____.

NOTARY PUBLIC

My Commission Expires: _____

Exhibit A - Bows and Arrows Flowers

Please produce the following documents relating to the event(s) hosted by Emily Daggett and Charles Fridge in The Bahamas during the week of October 21, 2024 – October 27, 2024:

1. Contract executed between Bows and Arrows Flowers or any representative thereof and Charles Fridge, Emily Daggett, or any individual or entity on their behalf;
2. Records of all payments received from Charles Fridge, Emily Daggett, and/or any individual or entity on their behalf;
3. Records of any flights on behalf of Bows and Arrows Flowers to The Bahamas, including flights for any preparation prior to the week of October 21, 2024 (i.e. scouting visits);
4. Records of any accommodations of Bows and Arrows Flowers paid for by Emily Daggett and/or Charles Fridge, or any individual or entity on their behalf, for stays in The Bahamas;
5. A copy of any photographs or videos posted to any social media account of Bows and Arrows Flowers relating to the events in The Bahamas hosted by Emily Daggett and/or Charles Fridge;
6. All communications between Bows and Arrows Flowers or any representative thereof and Charles Fridge, Emily Daggett, and/or any other individuals on their behalf to specifically include Katy Preisler;
7. Any and all additional documents in possession of Bows and Arrows Flowers relating to the events hosted by Emily Daggett and/or Charles Fridge in The Bahamas.

DEPOSITION SUBPOENA TO TESTIFY OR PRODUCE DOCUMENTS OR THINGS
THE STATE OF TEXAS

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es):

Custodian of Records for:

Preisler Productions LLC
c/o Its Registered Agent,
United States Corporation Agents, Inc.
10601 Clarence Drive, Ste. 250
Frisco, TX 75033 713-396-2558

to be and appear before a Notary Public of my designation for

Champion Records Service, LLC 877-290-4224
9039 Katy Freeway, Suite 336, Houston, TX 77024

or its designated agent, on **11/19/2024**, at **10 a.m.**, at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all records and/or documents outlined in the attached "Exhibit A-Preisler Productions LLC" in the custodian's control, custody or possession

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to the attached Exhibit "A", at any and all times whatsoever, then and there to give evidence at the instance of the **Petitioner, Danielle L. Fridge**, represented by **John E. Van Ness**, Attorney of Record, in that Certain Cause No. **2021-06778**, pending on the docket of the **District Court of the 245th Judicial District of Harris County, Texas**.

This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

IN THE MATTER OF
THE MARRIAGE OF
DANIELLE L. FRIDGE

and

CHARLES L. FRIDGE, III and
IN THE INTEREST OF C. L. F., IV,
C. L. F. and C. L. F., CHILDREN

and there remain from day to day and time to time until discharged according to law.



WITNESS MY HAND THIS 25th day of October, 2024.

A handwritten signature in black ink, appearing to be "C. Champion", written over a horizontal line.

NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt.* Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

OFFICER'S RETURN

Came to hand this _____ day of _____, 20____, and executed this the ____ day of _____, 20____, in the following manner: By delivering to the witness _____, a true copy hereof. A \$ _____ witness fee was tendered at the time of the serve.

Returned this _____ day of _____, 20____.

PROCESS SERVER

Order No. 19265.029

No. 2021-06778

IN THE MATTER OF
THE MARRIAGE OF
DANIELLE L. FRIDGE

and
CHARLES L. FRIDGE, III and
IN THE INTEREST OF C. L. F., IV,
C. L. F. and C. L. F., CHILDREN

§
§
§
§
§
§
§

IN THE DISTRICT COURT

HARRIS COUNTY, TEXAS

245TH JUDICIAL DISTRICT

DIRECT QUESTIONS TO BE PROPOUNDED TO THE WITNESS

Custodian of Records for: **Preisler Productions LLC**

Records Pertaining To: **Any and all records and/or documents outlined in the attached "Exhibit A-Preisler Productions LLC" in the custodian's control, custody or possession**

1. Please state your full name and phone number.

Answer: _____

Phone Number: _____

2. Please state by whom you are employed and the business address.

Employed: _____

Address: _____

3. What is the title of your position or job?

Answer: _____

4. Are you a/the custodian of records for Preisler Productions LLC?

Answer: _____

5. Are the records, documents, memorandum, reports, records, and data compilations, outlined in the attached Exhibit A, in your custody or subject to your control, supervision or direction?

Answer: _____

6. Are you able to identify the aforementioned records as the originals or true copies of the originals?

Answer: _____

7. Please hand to the Officer taking this deposition, copies of the records, documents, memorandum, reports, records, and data compilations mentioned in Question No. 5. Have you done so? If not, why?

Answer: _____

8. Are the copies which you handed to the Officer taking this deposition, true and correct copies of all such records, documents, memorandum, reports, records, and data compilations?

Answer: _____

9. Were such records, documents, memorandum, reports, records, and data compilations kept in the regular course of business by Preisler Productions LLC?

Answer: _____

10. Have you turned over all records as listed under Number 1 of the attached Exhibit A? If not, please explain why not.

Answer: _____

11. Have you turned over all records as listed under Number 2 of the attached Exhibit A? If not, please explain why not.

Answer: _____

12. Have you turned over all records as listed under Number 3 of the attached Exhibit A? If not, please explain why not.

Answer: _____

13. Have you turned over all records as listed under Number 4 of the attached Exhibit A? If not, please explain why not.

Answer: _____

14. Have you turned over all records as listed under Number 5 of the attached Exhibit A? If not, please explain why not.

Answer: _____

15. Have you turned over all records as listed under Number 6 of the attached Exhibit A? If not, please explain why not.

Answer: _____

16. Have you turned over all records as listed under Number 7 of the attached Exhibit A? If not, please explain why not.

Answer: _____

17. What is the retention period of records of this nature by Preisler Productions LLC?

Answer: _____

18. Was it in the regular course of business of Preisler Productions LLC for a person with knowledge of the acts, events, conditions, opinion, or diagnoses, recorded to make the record or to transmit information thereof to be included in such record?

Answer: _____

19. Were the entries on the records, documents, memorandum, reports, records, and data compilations made at, or shortly after, the time of the transaction recorded on these entries?

Answer: _____

20. Was the method of preparation of these records trustworthy?

Answer: _____

WITNESS (Custodian of Records)

Before me, the undersigned authority, on this day personally appeared _____, known to me to be the person whose name is subscribed to the foregoing instrument in the capacity therein stated, who being first duly sworn, stated upon his/her oath that the answers to the foregoing questions are true and correct. I further certify that the records attached hereto are exact duplicates of the original records.

SWORN TO AND SUBSCRIBED before me this _____ day of _____, 20____.

NOTARY PUBLIC

My Commission Expires: _____

Exhibit A - Preisler Productions LLC

Please produce the following documents relating to the event(s) hosted by Emily Daggett and Charles Fridge in The Bahamas during the week of October 21, 2024 – October 27, 2024:

1. Contract executed between Preisler Productions or any representative thereof and Charles Fridge, Emily Daggett, or any individual or entity on their behalf;
2. Records of all payments received from Charles Fridge, Emily Daggett, and/or any individual or entity on their behalf;
3. Records of any flights on behalf of Preisler Productions to The Bahamas, including flights for any preparation prior to the week of October 21, 2024 (i.e. scouting visits);
4. Records of any accommodations of Preisler Productions paid for by Emily Daggett and/or Charles Fridge, or any individual or entity on their behalf, for stays in The Bahamas;
5. A copy of any photographs or videos posted to any social media account of Preisler Productions and/or Katy Preisler, individually, relating to the events in The Bahamas hosted by Emily Daggett and/or Charles Fridge;
6. All communications between Preisler Productions, Katy Preisler, or any representative thereof and Charles Fridge, Emily Daggett, and/or any other individuals on their behalf;
7. Any and all additional documents in possession of Preisler Productions relating to the events hosted by Emily Daggett and/or Charles Fridge in The Bahamas.

DEPOSITION SUBPOENA TO TESTIFY OR PRODUCE DOCUMENTS OR THINGS
THE STATE OF TEXAS

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es):

Custodian of Records for:

Chris Bailey Photography
c/o Its Registered Agent,
Christopher Bailey
4809 Blossom Street
Houston, TX 77007 713-518-1452

to be and appear before a Notary Public of my designation for

Champion Records Service, LLC 877-290-4224
9039 Katy Freeway, Suite 336, Houston, TX 77024

or its designated agent, on **11/19/2024**, at **10 a.m.**, at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all records and/or documents outlined in the attached "Exhibit A-Chris Bailey Photography" in the custodian's control, custody or possession

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to the attached Exhibit "A", at any and all times whatsoever, then and there to give evidence at the instance of the **Petitioner, Danielle L. Fridge**, represented by **John E. Van Ness**, Attorney of Record, in that Certain Cause No. **2021-06778**, pending on the docket of the **District Court of the 245th Judicial District of Harris County, Texas**.

This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

IN THE MATTER OF
THE MARRIAGE OF
DANIELLE L. FRIDGE

and

CHARLES L. FRIDGE, III and
IN THE INTEREST OF C. L. F., IV,
C. L. F. and C. L. F., CHILDREN

and there remain from day to day and time to time until discharged according to law.



WITNESS MY HAND THIS 25th day of October, 2024.

A handwritten signature in black ink, appearing to be "C. Champion", written over a horizontal line.

NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt.* Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

OFFICER'S RETURN

Came to hand this _____ day of _____, 20____, and executed this the ____ day of _____, 20____, in the following manner: By delivering to the witness _____, a true copy hereof. A \$ _____ witness fee was tendered at the time of the serve.

Returned this _____ day of _____, 20____.

PROCESS SERVER

Order No. 19265.030

No. 2021-06778

IN THE MATTER OF
THE MARRIAGE OF
DANIELLE L. FRIDGE

and

CHARLES L. FRIDGE, III and
IN THE INTEREST OF C. L. F., IV,
C. L. F. and C. L. F., CHILDREN

§
§
§
§
§
§
§

IN THE DISTRICT COURT

HARRIS COUNTY, TEXAS

245TH JUDICIAL DISTRICT

DIRECT QUESTIONS TO BE PROPOUNDED TO THE WITNESS

Custodian of Records for: **Chris Bailey Photography**

Records Pertaining To: **Any and all records and/or documents outlined in the attached "Exhibit A-Chris Bailey Photography" in the custodian's control, custody or possession**

1. Please state your full name and phone number.

Answer: _____

Phone Number: _____

2. Please state by whom you are employed and the business address.

Employed: _____

Address: _____

3. What is the title of your position or job?

Answer: _____

4. Are you a/the custodian of records for Chris Bailey Photography?

Answer: _____

5. Are the records, documents, memorandum, reports, records, and data compilations, outlined in the attached Exhibit A, in your custody or subject to your control, supervision or direction?

Answer: _____

6. Are you able to identify the aforementioned records as the originals or true copies of the originals?

Answer: _____

7. Please hand to the Officer taking this deposition, copies of the records, documents, memorandum, reports, records, and data compilations mentioned in Question No. 5. Have you done so? If not, why?

Answer: _____

8. Are the copies which you handed to the Officer taking this deposition, true and correct copies of all such records, documents, memorandum, reports, records, and data compilations?

Answer: _____

9. Were such records, documents, memorandum, reports, records, and data compilations kept in the regular course of business by Chris Bailey Photography?

Answer: _____

10. Have you turned over all records as listed under Number 1 of the attached Exhibit A? If not, please explain why not.

Answer: _____

11. Have you turned over all records as listed under Number 2 of the attached Exhibit A? If not, please explain why not.

Answer: _____

12. Have you turned over all records as listed under Number 3 of the attached Exhibit A? If not, please explain why not.

Answer: _____

13. Have you turned over all records as listed under Number 4 of the attached Exhibit A? If not, please explain why not.

Answer: _____

14. Have you turned over all records as listed under Number 5 of the attached Exhibit A? If not, please explain why not.

Answer: _____

15. Have you turned over all records as listed under Number 6 of the attached Exhibit A? If not, please explain why not.

Answer: _____

16. Have you turned over all records as listed under Number 7 of the attached Exhibit A? If not, please explain why not.

Answer: _____

17. What is the retention period of records of this nature by Chris Bailey Photography?

Answer: _____

18. Was it in the regular course of business of Chris Bailey Photography for a person with knowledge of the acts, events, conditions, opinion, or diagnoses, recorded to make the record or to transmit information thereof to be included in such record?

Answer: _____

19. Were the entries on the records, documents, memorandum, reports, records, and data compilations made at, or shortly after, the time of the transaction recorded on these entries?

Answer: _____

20. Was the method of preparation of these records trustworthy?

Answer: _____

WITNESS (Custodian of Records)

Before me, the undersigned authority, on this day personally appeared _____, known to me to be the person whose name is subscribed to the foregoing instrument in the capacity therein stated, who being first duly sworn, stated upon his/her oath that the answers to the foregoing questions are true and correct. I further certify that the records attached hereto are exact duplicates of the original records.

SWORN TO AND SUBSCRIBED before me this _____ day of _____, 20____.

NOTARY PUBLIC

My Commission Expires: _____

Exhibit A - Chris Bailey Photography

Please produce the following documents relating to the event(s) hosted by Emily Daggett and Charles Fridge in The Bahamas during the week of October 21, 2024 – October 27, 2024:

1. Contract executed between Chris Bailey Photography or any representative thereof and Charles Fridge, Emily Daggett, or any individual or entity on their behalf;
2. Records of all payments received from Charles Fridge, Emily Daggett, and/or any individual or entity on their behalf;
3. Records of any flights on behalf of Chris Bailey Photography to The Bahamas, including flights for any preparation prior to the week of October 21, 2024 (i.e. scouting visits);
4. Records of any accommodations of Chris Baily Photography paid for by Emily Daggett and/or Charles Fridge, or any individual or entity on their behalf, for stays in The Bahamas;
5. A copy of any photographs or videos posted to any social media account of Chris Bailey Photography relating to the events in The Bahamas hosted by Emily Daggett and/or Charles Fridge;
6. All communications between Chris Bailey Photography or any representative thereof and Charles Fridge, Emily Daggett, and/or any other individuals on their behalf to specifically include Katy Preisler;
7. Any and all additional documents in possession of Chris Bailey Photography relating to the events hosted by Emily Daggett and/or Charles Fridge in The Bahamas.

DEPOSITION SUBPOENA TO TESTIFY OR PRODUCE DOCUMENTS OR THINGS
THE STATE OF TEXAS

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es):

Custodian of Records for:

31 Films, L.L.C.

c/o Its Registered Agent,

Joseph L. Mathews

10506 Fairview

Conroe, TX 77385 281-259-1220

to be and appear before a Notary Public of my designation for

Champion Records Service, LLC 877-290-4224

9039 Katy Freeway, Suite 336, Houston, TX 77024

or its designated agent, on **11/19/2024**, at **10 a.m.**, at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all records and/or documents outlined in the attached "Exhibit A-31 Films, L.L.C." in the custodian's control, custody or possession

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to the attached Exhibit "A", at any and all times whatsoever, then and there to give evidence at the instance of the **Petitioner, Danielle L. Fridge**, represented by **John E. Van Ness**, Attorney of Record, in that Certain Cause No. **2021-06778**, pending on the docket of the **District Court of the 245th Judicial District of Harris County, Texas**.

This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

**IN THE MATTER OF
THE MARRIAGE OF
DANIELLE L. FRIDGE**

and

CHARLES L. FRIDGE, III and

IN THE INTEREST OF C. L. F., IV,

C. L. F. and C. L. F., CHILDREN

and there remain from day to day and time to time until discharged according to law.



WITNESS MY HAND THIS 25th day of October, 2024.

A handwritten signature in black ink, appearing to be "C. Champion", written over a horizontal line.

NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt.* Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

OFFICER'S RETURN

Came to hand this _____ day of _____, 20____, and executed this the ____ day of _____, 20____, in the following manner: By delivering to the witness _____, a true copy hereof. A \$ _____ witness fee was tendered at the time of the serve.

Returned this _____ day of _____, 20____.

PROCESS SERVER

Order No. 19265.031

No. 2021-06778

IN THE MATTER OF
THE MARRIAGE OF
DANIELLE L. FRIDGE

and
CHARLES L. FRIDGE, III and
IN THE INTEREST OF C. L. F., IV,
C. L. F. and C. L. F., CHILDREN

§
§
§
§
§
§
§

IN THE DISTRICT COURT

HARRIS COUNTY, TEXAS

245TH JUDICIAL DISTRICT

DIRECT QUESTIONS TO BE PROPOUNDED TO THE WITNESS

Custodian of Records for: **31 Films, L.L.C.**

Records Pertaining To: **Any and all records and/or documents outlined in the attached "Exhibit A-31 Films, L.L.C." in the custodian's control, custody or possession**

1. Please state your full name and phone number.

Answer: _____

Phone Number: _____

2. Please state by whom you are employed and the business address.

Employed: _____

Address: _____

3. What is the title of your position or job?

Answer: _____

4. Are you a/the custodian of records for 31 Films, L.L.C.?

Answer: _____

5. Are the records, documents, memorandum, reports, records, and data compilations, outlined in the attached Exhibit A, in your custody or subject to your control, supervision or direction?

Answer: _____

6. Are you able to identify the aforementioned records as the originals or true copies of the originals?

Answer: _____

7. Please hand to the Officer taking this deposition, copies of the records, documents, memorandum, reports, records, and data compilations mentioned in Question No. 5. Have you done so? If not, why?

Answer: _____

8. Are the copies which you handed to the Officer taking this deposition, true and correct copies of all such records, documents, memorandum, reports, records, and data compilations?

Answer: _____

9. Were such records, documents, memorandum, reports, records, and data compilations kept in the regular course of business by 31 Films, L.L.C.?

Answer: _____

10. Have you turned over all records as listed under Number 1 of the attached Exhibit A? If not, please explain why not.

Answer: _____

11. Have you turned over all records as listed under Number 2 of the attached Exhibit A? If not, please explain why not.

Answer: _____

12. Have you turned over all records as listed under Number 3 of the attached Exhibit A? If not, please explain why not.

Answer: _____

13. Have you turned over all records as listed under Number 4 of the attached Exhibit A? If not, please explain why not.

Answer: _____

14. Have you turned over all records as listed under Number 5 of the attached Exhibit A? If not, please explain why not.

Answer: _____

15. Have you turned over all records as listed under Number 6 of the attached Exhibit A? If not, please explain why not.

Answer: _____

16. Have you turned over all records as listed under Number 7 of the attached Exhibit A? If not, please explain why not.

Answer: _____

17. What is the retention period of records of this nature by 31 Films, L.L.C.?

Answer: _____

18. Was it in the regular course of business of 31 Films, L.L.C. for a person with knowledge of the acts, events, conditions, opinion, or diagnoses, recorded to make the record or to transmit information thereof to be included in such record?

Answer: _____

19. Were the entries on the records, documents, memorandum, reports, records, and data compilations made at, or shortly after, the time of the transaction recorded on these entries?

Answer: _____

20. Was the method of preparation of these records trustworthy?

Answer: _____

WITNESS (Custodian of Records)

Before me, the undersigned authority, on this day personally appeared _____, known to me to be the person whose name is subscribed to the foregoing instrument in the capacity therein stated, who being first duly sworn, stated upon his/her oath that the answers to the foregoing questions are true and correct. I further certify that the records attached hereto are exact duplicates of the original records.

SWORN TO AND SUBSCRIBED before me this _____ day of _____, 20____.

NOTARY PUBLIC

My Commission Expires: _____

Exhibit A - 31 Films, L.L.C.

Please produce the following documents relating to the event(s) hosted by Emily Daggett and Charles Fridge in The Bahamas during the week of October 21, 2024 – October 27, 2024:

1. Contract executed between 31 Films or any representative thereof and Charles Fridge, Emily Daggett, or any individual or entity on their behalf;
2. Records of all payments received from Charles Fridge, Emily Daggett, and/or any individual or entity on their behalf;
3. Records of any flights on behalf of 31 Films to The Bahamas, including flights for any preparation prior to the week of October 21, 2024 (i.e. scouting visits);
4. Records of any accommodations paid for by Emily Daggett and/or Charles Fridge, or any individual or entity on their behalf, for stays in The Bahamas;
5. A copy of any photographs or videos posted to any social media account of 31 Films relating to the events in The Bahamas hosted by Emily Daggett and/or Charles Fridge;
6. All communications between 31 Films or any representative thereof and Charles Fridge, Emily Daggett, and/or any other individuals on their behalf to specifically include Katy Preisler;
7. Any and all additional documents in possession of 31 Films relating to the events hosted by Emily Daggett and/or Charles Fridge in The Bahamas.

DEPOSITION SUBPOENA TO TESTIFY OR PRODUCE DOCUMENTS OR THINGS
THE STATE OF TEXAS

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es):

Custodian of Records for:

ACE Endeavors, Inc.
c/o Its Registered Agent,
Ann C. Eifler
3201 Allen Parkway, Suite 275
Houston, TX 77019 713-523-7004

to be and appear before a Notary Public of my designation for

Champion Records Service, LLC 877-290-4224
9039 Katy Freeway, Suite 336, Houston, TX 77024

or its designated agent, on **11/19/2024**, at **10 a.m.**, at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all records and/or documents outlined in the attached "Exhibit A-ACE Endeavors, Inc." in the custodian's control, custody or possession

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to the attached Exhibit "A", at any and all times whatsoever, then and there to give evidence at the instance of the **Petitioner, Danielle L. Fridge**, represented by **John E. Van Ness**, Attorney of Record, in that Certain Cause No. **2021-06778**, pending on the docket of the **District Court of the 245th Judicial District of Harris County, Texas**.

This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

IN THE MATTER OF
THE MARRIAGE OF
DANIELLE L. FRIDGE

and

CHARLES L. FRIDGE, III and
IN THE INTEREST OF C. L. F., IV,
C. L. F. and C. L. F., CHILDREN

and there remain from day to day and time to time until discharged according to law.



WITNESS MY HAND THIS 25th day of October, 2024.

A handwritten signature in black ink, appearing to be "C. Champion", written over a horizontal line.

NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt.* Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

OFFICER'S RETURN

Came to hand this _____ day of _____, 20____, and executed this the ____ day of _____, 20____, in the following manner: By delivering to the witness _____, a true copy hereof. A \$ _____ witness fee was tendered at the time of the serve.

Returned this _____ day of _____, 20____.

PROCESS SERVER

Order No. 19265.032

No. 2021-06778

IN THE MATTER OF
THE MARRIAGE OF
DANIELLE L. FRIDGE

and
CHARLES L. FRIDGE, III and
IN THE INTEREST OF C. L. F., IV,
C. L. F. and C. L. F., CHILDREN

§
§
§
§
§
§
§

IN THE DISTRICT COURT

HARRIS COUNTY, TEXAS

245TH JUDICIAL DISTRICT

DIRECT QUESTIONS TO BE PROPOUNDED TO THE WITNESS

Custodian of Records for: **ACE Endeavors, Inc.**

Records Pertaining To: **Any and all records and/or documents outlined in the attached "Exhibit A-ACE Endeavors, Inc." in the custodian's control, custody or possession**

1. Please state your full name and phone number.

Answer: _____

Phone Number: _____

2. Please state by whom you are employed and the business address.

Employed: _____

Address: _____

3. What is the title of your position or job?

Answer: _____

4. Are you a/the custodian of records for ACE Endeavors, Inc.?

Answer: _____

5. Are the records, documents, memorandum, reports, records, and data compilations, outlined in the attached Exhibit A, in your custody or subject to your control, supervision or direction?

Answer: _____

6. Are you able to identify the aforementioned records as the originals or true copies of the originals?

Answer: _____

7. Please hand to the Officer taking this deposition, copies of the records, documents, memorandum, reports, records, and data compilations mentioned in Question No. 5. Have you done so? If not, why?

Answer: _____

8. Are the copies which you handed to the Officer taking this deposition, true and correct copies of all such records, documents, memorandum, reports, records, and data compilations?

Answer: _____

9. Were such records, documents, memorandum, reports, records, and data compilations kept in the regular course of business by ACE Endeavors, Inc.?

Answer: _____

10. Have you turned over all records as listed under Number 1 of the attached Exhibit A? If not, please explain why not.

Answer: _____

11. Have you turned over all records as listed under Number 2 of the attached Exhibit A? If not, please explain why not.

Answer: _____

12. Have you turned over all records as listed under Number 3 of the attached Exhibit A? If not, please explain why not.

Answer: _____

13. Have you turned over all records as listed under Number 4 of the attached Exhibit A? If not, please explain why not.

Answer: _____

14. Have you turned over all records as listed under Number 5 of the attached Exhibit A? If not, please explain why not.

Answer: _____

15. Have you turned over all records as listed under Number 6 of the attached Exhibit A? If not, please explain why not.

Answer: _____

16. Have you turned over all records as listed under Number 7 of the attached Exhibit A? If not, please explain why not.

Answer: _____

17. What is the retention period of records of this nature by ACE Endeavors, Inc.?

Answer: _____

18. Was it in the regular course of business of ACE Endeavors, Inc. for a person with knowledge of the acts, events, conditions, opinion, or diagnoses, recorded to make the record or to transmit information thereof to be included in such record?

Answer: _____

19. Were the entries on the records, documents, memorandum, reports, records, and data compilations made at, or shortly after, the time of the transaction recorded on these entries?

Answer: _____

20. Was the method of preparation of these records trustworthy?

Answer: _____

WITNESS (Custodian of Records)

Before me, the undersigned authority, on this day personally appeared _____, known to me to be the person whose name is subscribed to the foregoing instrument in the capacity therein stated, who being first duly sworn, stated upon his/her oath that the answers to the foregoing questions are true and correct. I further certify that the records attached hereto are exact duplicates of the original records.

SWORN TO AND SUBSCRIBED before me this _____ day of _____, 20____.

NOTARY PUBLIC

My Commission Expires: _____

Exhibit A - ACE Endeavors, Inc.

Please produce the following documents relating to the event(s) hosted by Emily Daggett and Charles Fridge in The Bahamas during the week of October 21, 2024 – October 27, 2024:

1. Contract executed between Gulf Coast Entertainment and/or Nick and The Hits, or any representative thereof, and Charles Fridge, Emily Daggett, or any individual or entity on their behalf;
2. Records of all payments received from Charles Fridge, Emily Daggett, and/or any individual or entity on their behalf;
3. Records of any flights on behalf of Nick and The Hits, including flights for any preparation prior to the week of October 21, 2024 (i.e. scouting visits);
4. Records of any accommodations of Nick and The Hits paid for by Emily Daggett and/or Charles Fridge, or any individual or entity on their behalf, for stays in The Bahamas;
5. A copy of any photographs or videos posted to any social media account of Gulf Coast Entertainment and/or Nick and The Hits relating to the events in The Bahamas hosted by Emily Daggett and/or Charles Fridge;
6. All communications between Gulf Coast Entertainment, or any representative thereof, including Nick and The Hits, and Charles Fridge, Emily Daggett, and/or any other individuals on their behalf to specifically include Katy Preisler;
7. Any and all additional documents in possession of Gulf Coast Entertainment relating to the events hosted by Emily Daggett and/or Charles Fridge in The Bahamas.

DEPOSITION SUBPOENA TO TESTIFY OR PRODUCE DOCUMENTS OR THINGS
THE STATE OF TEXAS

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es):

Custodian of Records for:

Etoilly Artistry LLC
c/o Its Registered Agent,
Kailey Nous
4403 Ashford Drive
Dallas, TX 75214 281-702-3802

to be and appear before a Notary Public of my designation for

Champion Records Service, LLC 877-290-4224
9039 Katy Freeway, Suite 336, Houston, TX 77024

or its designated agent, on **11/19/2024**, at **10 a.m.**, at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all records and/or documents outlined in the attached "Exhibit A-Etoilly Artistry LLC" in the custodian's control, custody or possession

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to the attached Exhibit "A", at any and all times whatsoever, then and there to give evidence at the instance of the **Petitioner, Danielle L. Fridge**, represented by **John E. Van Ness**, Attorney of Record, in that Certain Cause No. **2021-06778**, pending on the docket of the **District Court of the 245th Judicial District of Harris County, Texas**.

This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

IN THE MATTER OF
THE MARRIAGE OF
DANIELLE L. FRIDGE

and

CHARLES L. FRIDGE, III and
IN THE INTEREST OF C. L. F., IV,
C. L. F. and C. L. F., CHILDREN

and there remain from day to day and time to time until discharged according to law.



WITNESS MY HAND THIS 25th day of October, 2024.

A handwritten signature in black ink, appearing to be "CC", written over a horizontal line.

NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt.* Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

OFFICER'S RETURN

Came to hand this _____ day of _____, 20____, and executed this the ____ day of _____, 20____, in the following manner: By delivering to the witness _____, a true copy hereof. A \$ _____ witness fee was tendered at the time of the serve.

Returned this _____ day of _____, 20____.

PROCESS SERVER

Order No. 19265.033

No. 2021-06778

IN THE MATTER OF
THE MARRIAGE OF
DANIELLE L. FRIDGE

and
CHARLES L. FRIDGE, III and
IN THE INTEREST OF C. L. F., IV,
C. L. F. and C. L. F., CHILDREN

§
§
§
§
§
§
§

IN THE DISTRICT COURT

HARRIS COUNTY, TEXAS

245TH JUDICIAL DISTRICT

DIRECT QUESTIONS TO BE PROPOUNDED TO THE WITNESS

Custodian of Records for: **Etoilly Artistry LLC**

Records Pertaining To: **Any and all records and/or documents outlined in the attached "Exhibit A-Etoilly Artistry LLC" in the custodian's control, custody or possession**

1. Please state your full name and phone number.

Answer: _____

Phone Number: _____

2. Please state by whom you are employed and the business address.

Employed: _____

Address: _____

3. What is the title of your position or job?

Answer: _____

4. Are you a/the custodian of records for Etoilly Artistry LLC?

Answer: _____

5. Are the records, documents, memorandum, reports, records, and data compilations, outlined in the attached Exhibit A, in your custody or subject to your control, supervision or direction?

Answer: _____

6. Are you able to identify the aforementioned records as the originals or true copies of the originals?

Answer: _____

7. Please hand to the Officer taking this deposition, copies of the records, documents, memorandum, reports, records, and data compilations mentioned in Question No. 5. Have you done so? If not, why?

Answer: _____

8. Are the copies which you handed to the Officer taking this deposition, true and correct copies of all such records, documents, memorandum, reports, records, and data compilations?

Answer: _____

9. Were such records, documents, memorandum, reports, records, and data compilations kept in the regular course of business by Etoilly Artistry LLC?

Answer: _____

10. Have you turned over all records as listed under Number 1 of the attached Exhibit A? If not, please explain why not.

Answer: _____

11. Have you turned over all records as listed under Number 2 of the attached Exhibit A? If not, please explain why not.

Answer: _____

12. Have you turned over all records as listed under Number 3 of the attached Exhibit A? If not, please explain why not.

Answer: _____

13. Have you turned over all records as listed under Number 4 of the attached Exhibit A? If not, please explain why not.

Answer: _____

14. Have you turned over all records as listed under Number 5 of the attached Exhibit A? If not, please explain why not.

Answer: _____

15. Have you turned over all records as listed under Number 6 of the attached Exhibit A? If not, please explain why not.

Answer: _____

16. Have you turned over all records as listed under Number 7 of the attached Exhibit A? If not, please explain why not.

Answer: _____

17. What is the retention period of records of this nature by Etoilly Artistry LLC?

Answer: _____

18. Was it in the regular course of business of Etoilly Artistry LLC for a person with knowledge of the acts, events, conditions, opinion, or diagnoses, recorded to make the record or to transmit information thereof to be included in such record?

Answer: _____

19. Were the entries on the records, documents, memorandum, reports, records, and data compilations made at, or shortly after, the time of the transaction recorded on these entries?

Answer: _____

20. Was the method of preparation of these records trustworthy?

Answer: _____

WITNESS (Custodian of Records)

Before me, the undersigned authority, on this day personally appeared _____, known to me to be the person whose name is subscribed to the foregoing instrument in the capacity therein stated, who being first duly sworn, stated upon his/her oath that the answers to the foregoing questions are true and correct. I further certify that the records attached hereto are exact duplicates of the original records.

SWORN TO AND SUBSCRIBED before me this _____ day of _____, 20____.

NOTARY PUBLIC

My Commission Expires: _____

Exhibit A - Etoilly Artistry LLC

Please produce the following documents relating to the event(s) hosted by Emily Daggett and Charles Fridge in The Bahamas during the week of October 21, 2024 – October 27, 2024:

1. Contract executed between Etoilly Artistry or any representative thereof and Charles Fridge, Emily Daggett, or any individual or entity on their behalf;
2. Records of all payments received from Charles Fridge, Emily Daggett, and/or any individual or entity on their behalf;
3. Records of any flights on behalf of Etoilly Artistry to The Bahamas, including flights for any preparation prior to the week of October 21, 2024 (i.e. scouting visits);
4. Records of any accommodations of Etoilly Artistry paid for by Emily Daggett and/or Charles Fridge, or any individual or entity on their behalf, for stays in The Bahamas;
5. A copy of any photographs or videos posted to any social media account of Etoilly Artistry relating to the events in The Bahamas hosted by Emily Daggett and/or Charles Fridge;
6. All communications between Etoilly Artistry or any representative thereof and Charles Fridge, Emily Daggett, and/or any other individuals on their behalf to specifically include Katy Preisler;
7. Any and all additional documents in possession of Etoilly Artistry relating to the events hosted by Emily Daggett and/or Charles Fridge in The Bahamas.

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 93568467

Filing Code Description: Notice

Filing Description: Notice Deposition Written Questions 19265 28-33

Status as of 10/25/2024 11:03 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Alan Daughtry	793583	alan@alandaughtrylaw.com	10/25/2024 10:15:35 AM	SENT
Jeff Diamant - Service		service@jeffdiamantlaw.com	10/25/2024 10:15:35 AM	SENT
Joseph Indelicato	10389400	jindelicatolaw@indelicato.com	10/25/2024 10:15:35 AM	SENT
Bobby Newman	791347	bknservice@bobbyknewman.com	10/25/2024 10:15:35 AM	SENT
TJ Mitchell		tj@LVfirm.com	10/25/2024 10:15:35 AM	SENT
John E. Van Ness		Service@LVFirm.com	10/25/2024 10:15:35 AM	SENT
Claire Elizabeth Rogers		claire@lvfirm.com	10/25/2024 10:15:35 AM	SENT
Wesley Ward		hcdocket@hope-causey.com	10/25/2024 10:15:35 AM	SENT
Michael Poynter		mpoynter@vargolawfirm.com	10/25/2024 10:15:35 AM	SENT
Travis Vargo		tvargo@vargolawfirm.com	10/25/2024 10:15:35 AM	SENT